

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,
Plaintiff,
v.
ZACKARY ELLIS SANDERS,
Defendant.

Case No. 1:20-cr-00143

Honorable T.S. Ellis, III

Sentencing: April 1, 2022

**MOTION FOR RETURN OF NON-CONTRABAND SEIZED
PROPERTY AND, ALTERNATIVELY, OBJECTION TO ENTRY OF
PRELIMINARY ORDER OF FORFEITURE**

Zackary Ellis Sanders, by counsel, moves this Honorable Court, pursuant to Fed. R. Crim. Pro. 41(g), for entry of an Order directing the United States to preserve and return copies of the non-contraband content of Mr. Sanders seized electronic devices. Additionally, Mr. Sanders objects to the entry of a preliminary forfeiture ordering the forfeiture of non-contraband, personal and business digital data stored on the electronic devices named in the Forfeiture Notice of the Indictment.

Mr. Sanders relies on the Memorandum in Support of this Motion filed herewith.

Respectfully submitted,

ZACKARY ELLIS SANDERS
By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of March 2022, the foregoing was served electronically on the counsel of record through the US District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ _____
Nina J. Ginsberg